

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

JAMES PERRY,

Plaintiff,

v.

FLEETWOOD ENTERPRISES, INC., et. al.

Defendants.

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\* Case No.: 2:06-cv-00502-MEF

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MOTION FOR ADMISSION *PRO HAC VICE*

The undersigned, C. Lance Gould, is a member in good standing of the bar of Alabama and admitted to practice before this Court, and respectfully moves this Court to permit the admission *pro hac vice* of Jon D. Pels, of the law firm of Pels, Anderson & Lee, L.L.C. The undersigned states as follows:

1. Jon D. Pels is associated in this action with C. Lance Gould who is a member, in good standing of the Alabama Bar and this Court.

2. In support of this Motion, movant respectfully refers the Court to the Affidavit of Jon D. Pels, attached hereto as Exhibit "A", demonstrating that he is licensed to practice law before the federal and state courts in the State of Maryland, Virginia, and District of Columbia.

/s/ C. Lance Gould

C. Lance Gould (ASB-0913-G66C)

OF COUNSEL:

BEASLEY, ALLEN, CROW, METHVIN,  
PORTIS & MILES, P.C.  
272 Commerce Street  
P. O. Box 4160  
Montgomery, AL 36103  
(334) 269-2343  
(334) 954-7555 (fax)

**CERTIFICATE OF SERVICE**

I hereby certify that I have filed the original of the foregoing document in this Court with copies to be served upon all Defendants of record as listed below by placing a copy of same in the United States Mail, first class, postage prepaid on this the 3<sup>rd</sup> day of December.

/s/ C. Lance Gould  
OF COUNSEL

James F. Crosby  
Hendrick S. Snow  
David Walker  
CROSBY SAAB, LLC  
6404 Hillcrest Park Court  
Mobile, Alabama 36695

Winston Edwards  
David Hilyer  
CRADDOCK, RENEKER & DAVIS, LLP  
4142 Carmichael Road, Suite C  
Montgomery, AL 36106

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**AFFIDAVIT**

Personally appeared before me, the undersigned authority of law in and for said State and County, the within named Jon D. Pels, who, having been by me first duly sworn, states on his oath as follows:

1. My name is Jon D. Pels and I am an adult, resident citizen of the State of Maryland. My business address is 4833 Rugby Avenue, Fourth Floor, Bethesda, Maryland 20814.

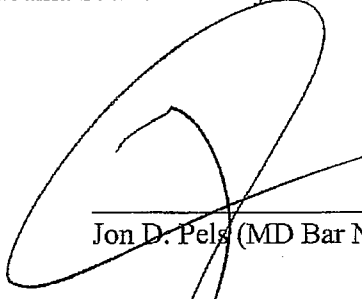
2. The name of the Court before which I desire to appear as counsel *pro hac vice* is the United States District Court for the Middle District of Alabama, Northern Division.

3. I have been admitted to practice law in the State of Maryland since 1993, the State of Virginia since 1996, and the District of Columbia since 1996, and I am currently licensed and in good standing to practice law in these states.


4. I am not currently suspended or disbarred by any jurisdiction in which I have been admitted to practice and have not been the subject of disciplinary action by the Bar of Courts of any such jurisdiction during the preceding five (5) years.

5. I state unto the Court that I will continue to represent the Plaintiffs in this cause until a final determination is made in this cause and with reference to all matters incident to this cause, I consent to the jurisdiction of the Courts of the State of Alabama, the disciplinary tribunal of the Alabama State Bar, and the Alabama Board of Admissions in all respects, the same as if I were a regular admitted licensed member of the Alabama Bar.

6. I have been associated in the above-styled and numbered cause by C. Lance Gould, a member in good standing of the Alabama State Bar who joins in this affidavit.

  
\_\_\_\_\_  
Jon D. Pels (MD Bar Number 11883)

Sworn to and subscribed before me, this the 26 day of NOVEMBER, 2007.

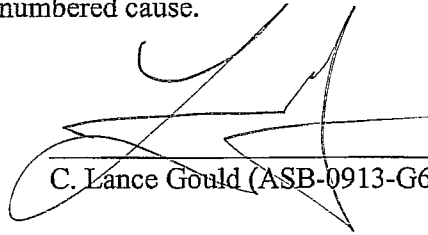
  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires:  
\_\_\_\_\_

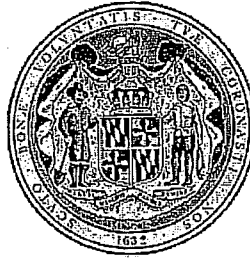


**JOINDER**

By the signature attached hereto, C. Lance Gould, hereby certifies that Jon D. Pels has been associated by him in the above-styled and numbered cause.

  
\_\_\_\_\_  
C. Lance Gould (ASB-0913-G66C)

**Court of Appeals  
of Maryland**  
Annapolis, MD



***CERTIFICATE OF GOOD STANDING***

STATE OF MARYLAND, ss:

*I, Alexander L. Cummings, Clerk of the Court of Appeals of Maryland,  
do hereby certify that on the sixteenth day of December, 1993,*

**Jon D. Pels**

*having first taken and subscribed the oath prescribed by the Constitution and  
Laws of this State, was admitted as an attorney of said Court, is now in good  
standing, and as such is entitled to practice law in any of the Courts of said  
State, subject to the Rules of Court.*

**In Testimony Whereof,** *I have hereunto  
set my hand as Clerk, and affixed the Seal  
of the Court of Appeals of Maryland, this  
ninth day of July, 2007.*

*Alexander L. Cummings*

Clerk of the Court of Appeals of Maryland

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**ORDER ON PRO HAC VICE**

Having received the Motion for Admission of Jon D. Pels to be specially admitted (*pro hac vice*) for the limited purpose of representation of the Plaintiff in the above-referenced matter, and finding the same to be in proper order, this Court hereby grants said motion.

Done this \_\_\_\_ day of \_\_\_\_\_, 2007.

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Honorable Mark E. Fuller

cc: C. Lance Gould  
Jon D. Pels  
James F. Crosby  
Hendrick S. Snow  
Winston Edwards  
David Hilyer



# Certificate of Good Standing

**UNITED STATES OF AMERICA**

**DISTRICT OF MARYLAND**

I, Felicia C. Cannon, Clerk of the United States District Court for the District of Maryland,

**DO HEREBY CERTIFY** that, **JON DENNIS PELS, ESQUIRE,**  
**BAR NUMBER 11883,** was duly admitted to practice in the United States District Court for the District of Maryland on January 14, 1994, and is currently in good standing as a member of the bar of this Court.

**Dated at Baltimore, Maryland**

**FELICIA C. CANNON**

**Clerk**

**Date: December 4, 2007**

**Tina Stavrou - Deputy Clerk**